

EXHIBIT B

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

SECURITIES INVESTOR PROTECTION
CORPORATION,

Plaintiff-Applicant,

v.

BERNARD L. MADOFF INVESTMENT
SECURITIES LLC,

Defendant.

In re:

BERNARD L. MADOFF,

Debtor.

Adv. Pro. No. 08-01789 (BRL)

SIPA Liquidation

(Substantively Consolidated)

**AFFIDAVIT OF MATTHEW COHEN IN SUPPORT OF THE TRUSTEE'S FIRST
OMNIBUS MOTION SEEKING TO EXPUNGE OBJECTIONS BY PARTIES THAT
DID NOT FILE CLAIMS**

STATE OF NEW YORK)
) ss:
COUNTY OF NEW YORK)

Matthew Cohen, being duly sworn, deposes and says:

1. I am a Managing Director of AlixPartners LLP. I make this affidavit to transmit to the Court information relevant to the motion by Irving H. Picard, trustee ("Trustee") for the liquidation of the business of Bernard L. Madoff Investment Securities LLC ("BLMIS") under the Securities Investor Protection Act, 15 U.S.C. § 78aaa *et seq.* ("SIPA"), and the substantively consolidated estate of Bernard L. Madoff ("Madoff") (collectively, "Debtor"), for an Order Approving the Trustee's first omnibus motion seeking to overrule any and all objections filed by or on behalf of parties that did not file claims ("Non Claimants") in the above-captioned case (the "First Omnibus Motion").

2. AlixPartners has served as the Trustee's Claims Agent and as the accountant for the BLMIS estate since December of 2008 pursuant to SIPA § 78fff-1(a)(1). As the Claims Agent, AlixPartners was responsible for both mailing the notice of the liquidation and claim forms to potential claimants and causing the notice of the liquidation to be published. AlixPartners has also been responsible for processing all claims submitted to the Trustee and assisting the Trustee in reviewing each customer claim filed to determine whether the asserted claim amount agrees with the "net equity" for that account, described herein more fully at ¶ 10. In addition, as the accountants for the BLMIS Estate, AlixPartners has assisted and continues to assist the Trustee in accounting for the assets of the BLMIS Estate, including the cash and cash equivalents available to the Trustee.

3. I have been actively involved in the liquidation of BLMIS and the claims process since December 2008 and have personal knowledge of the matters set forth herein.

The Claims Process

4. In accordance with the Court's order of December 23, 2008 (ECF No. 8), on or about January 2, 2009, AlixPartners mailed more than 15,000 claim forms to purported customers of BLMIS, purported customer's alternate mailing addresses, broker-dealers, and general creditors of the Debtor advising potential claimants of the Court-approved and statutory time limits for filing claims. AlixPartners completed certain additional notice mailings by January 9, 2009. (ECF No. 76).

5. In accordance with the Court's December 23, 2008 order, AlixPartners caused notice of the (i) SIPA liquidation proceeding; (ii) claims procedures; (iii) February 4, 2009 hearing on disinterestedness of the Trustee and his counsel; and (iv) February 20, 2009 meeting

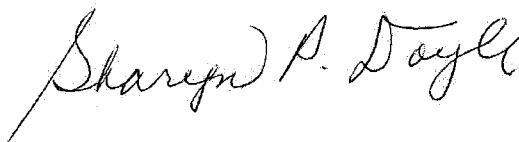
of creditors to be published on January 2, 2009 in *The New York Times*, *The Wall Street Journal*, *The Financial Times*, *USA Today*, *Jerusalem Post*, and *Ye'diot Achronot*. (ECF No. 57).

The Non Claimants

6. I make this affidavit ("Affidavit") to verify to the Court that as Claims Agent in the above-captioned case, after conducting a diligent review of all claims and objections submitted to the Court and the Trustee, we have not identified claims related to BLMIS accounts for which the objections were filed, submitted by or on behalf of those parties identified on Exhibit A as attached to the First Omnibus Motion under the heading "*Objections to be Overruled*" (collectively, the "Non Claimant Objections").

By: Matthew Cohen
Matthew Cohen

Sworn and subscribed to before me this 6th
day of March, 2012.


SHARYN P. DOYLE
Notary Public, State of New York
No. 01DO5051953
Qualified in New York County
Commission Expires Nov. 13, 2013